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September 2, 2021

***Via ECF***

The Honorable R. Barclay Surrick  
United States Courthouse  
601 Market Street, Room 8614  
Philadelphia, PA 19106

**Re: *In re Ex Parte Application of Iraq Telecom Ltd. Pursuant to 28 U.S.C. § 1782 for an Order to Take Discovery from Dechert LLP for Use in Foreign Proceedings, No. 19-mc-00175 RBS (E.D. Pa.)***

Dear Judge Surrick:

This responds to Iraq Telecom's August 31, 2021 letter to Your Honor, through which Iraq Telecom once again seeks to litigate its position and advance new arguments. Messrs. Youssef and Succar reject Iraq Telecom's accusations and respectfully request that the letter be disregarded.

Further, Iraq Telecom's letter ignores that the Supreme Court has scheduled oral argument in *Servotronics, Inc. v. Rolls-Royce PLC*, S. Ct. Dkt. No. 20-794, for October 5, 2021. (The Supreme Court granted *cert.* in that case to address the circuit split on whether private commercial arbitral bodies, such as the International Chamber of Commerce, qualify as "a foreign or international tribunal" for purposes of 28 U.S.C. § 1782(a), which issue is before this Court as well.)

Respectfully,

A handwritten signature in blue ink, appearing to read "R. Ebby", written over a horizontal line.

Robert L. Ebby

RLE/ht

cc: All Counsel of Record (via ECF)